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From: Schaefer2, Anthony (Law) <aschae@law.nyc.gov>

Date: Tue, Feb 1, 2022 at 9:21 AM

Subject: RE: [EXTERNAL] Re: 817450/2021E (Elizabeth Curran-Groome v. The City of New York et al)- Amended Complaint

To: Elena Cohen <elena@femmelaw.com>

CC: Riordan, Shannon (LAW) <sriordan@law.nyc.gov>, Weng, Jenny (Law) <jweng@law.nyc.gov>

Good morning,

We consent to the amendments as long as they are done within the time prescribed by the Statute of Limitations.

The Special Federal Litigation division is now handling this matter. Shannon Riordan, cc'd here, is the Special Fed ACC assigned to the matter. Jenny Weng, also cc'd here, is the supervising attorney.

Further correspondence should be directed towards them.

Regards,

Anthony J. Schaefer, Esq.

Assistant Corporation Counsel

New York City Law Department, Tort Division

Special State Law Enforcement Defense Unit

[100 Church Street](#)

[New York, NY 10007](#)

929-486-5584

aschae@law.nyc.gov

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From: Elena Cohen <elena@femmelaw.com>

Sent: Monday, January 31, 2022 4:27 PM

To: Schaefer2, Anthony (Law) <aschae@law.nyc.gov>

Subject: [EXTERNAL] Re: 817450/2021E (Elizabeth Curran-Groome v. The City of New York et al)- Amended Complaint

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A correction- the relevant SOL is tomorrow (February 1). I'd appreciate your position by noon tomorrow. Thank you.

On Mon, Jan 31, 2022 at 2:50 PM Elena Cohen <elena@femmelaw.com> wrote:

Hello Mr. Schaefer,

Attached is an amended complaint in the above captioned matter. I have attached a clean copy, and a copy with changes tracked. The changes relate to 2 issues: (1) updating procedural history and amending allegations re: venue now that this case has been removed to the SDNY and (2) amending the caption to include Kenneth Lehr.

Mr. Lehr was named a party to the complaint and there are factual allegations related to his conduct in the original complaint. Additionally, the original caption including Mr. Lehr's then-position as "COMMANDER OF NYPD PATROL BOROUGH BRONX". However, due to a clerical error, his name was not included in the caption.

Because some relevant state statute of limitations may run on February 2 (this Wednesday), please let me know by tomorrow at noon if you consent to these amendments.

Thank you,

Elena

Elena L. Cohen

Partner

| Cohen&Green P.L.L.C. | #FemmeLaw |
| (929) 888.9650 (p) | (929) 888.9457 (f) |
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